

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES  
AND PRODUCTS LIABILITY  
LITIGATION

Civil No. 3:16-md-2738-FLW-LHG

*This document relates to:*

Anne Unger and Robert Oshetsky v. Johnson  
& Johnson, et al.  
Case No. 3:21-cv-02718-FLW-LHG

**NOTICE TO TAKE VIDEOCONFERENCE  
VIDEOTAPED TRIAL PRESERVATION DEPOSITION**

**PLEASE TAKE NOTICE** that pursuant to Rule 30 of the *Federal Rules of Civil Procedure*, and pursuant to the MDL In Extremis Deposition Protocol dated January 23, 2017, the oral and videoconference videotaped deposition of Plaintiff, **Anne Unger**, will be taken before a person authorized to administer the oath. As per agreement of all parties, the oath will be administered over videoconference and the identity of the witness stipulated on the record. This videoconference deposition will be videotaped and recorded for use at trial and counsel are specifically informed that Plaintiff's health is declining such that she may not be available or capable to attend trial; therefore, this deposition is intended to preserve her testimony for use before the jury. The taking of said deposition may be adjourned from day to day until completed.

**DATE & TIME OF DEPOSITION:** **Tuesday, October 25, 2022 at 1:00 p.m.**

**LOCATION:** **Via Video Conference (link to be provided to Counsel prior to deposition)**

**COURT REPORTER:** **Carol Nygaard  
2295 Gateway Oaks Dr #170,  
Sacramento, CA 95833  
(916) 928-8999**

Dated: October 24, 2022

Respectfully submitted,

MARY ALEXANDER & ASSOCIATES, P.C.

/s/ Mary E. Alexander

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2022, a copy of the foregoing Notice of Deposition was filed electronically with the Clerk of the Court. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Mary E. Alexander  
Mary E. Alexander, Esq.